

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

SHAUNA ZIEMER, as Executrix :
of the Estate of Darrin E. Ziemer, :
Plaintiff :
v. : CIVIL ACTION
: DOCKET NO. 4:16-CV-01001
NORFOLK SOUTHERN :
RAILWAY COMPANY, CLINTON :
TOWNSHIP, GRIFFITH :
COMPANY AND ESTATE OF :
HOWARD E. MARTIN, JR. :
Defendants :

ANSWER OF THE ESTATE OF HOWARD E. MARTIN, JR.,
TO THE CROSSCLAIM OF NORFOLK SOUTHERN
RAILWAY COMPANY

79. The answer, affirmative defenses and crossclaim of the Estate of Howard E. Martin, Jr., is incorporated herein by reference.
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81. This is a conclusion of law to which no response is required. It is, however, denied that the Estate of Howard E. Martin Jr., is liable to plaintiff or to Clinton Township, in any way.

MITCHELL GALLAGHER, P.C.

BY: /s/ Gary L. Weber
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